

September 2003

Roles and Responsibilities

PS-IP-2

Personnel Security



Mailing Address

Privacy Office TMA

5111 Leesburg Pike Suite 810 Falls Church, VA 22041 TMA is committed to the protection of patient and sensitive data it is entrusted with, while at the same time striving to make appropriate and lawful access to that information possible in order to fulfill the DoD MHS mission. One measure to protect the use and disclosure of this information is the requirement of background investigations on all personnel with access to sensitive but unclassified information and related information systems. This paper specifically discusses roles and responsibilities for parties involved in the IT (ADP) application process.

The process of applying for and receiving IT (ADP) levels of trust involves three significant parties: the contractor security officer (or designee), the contractor employee, and the TMA Privacy Office. Each party has specific roles and responsibilities they must fulfill in order for the process to go smoothly.

Why must contractors apply for IT (ADP) levels of trust?

The Privacy Act of 1974, the Health Insurance Portability and Accountability Act (HIPAA), and the DoD Health Information Privacy Regulation (DoD 6025.18-R) along with the DoD 5200.2R Personnel Security Program (January 1987) and the DoD 5200.2R Personnel Security Program (draft June 2002) require that the DoD put in place appropriate safeguards to protect sensitive data. These safeguards against inappropriate use and disclosure must be upheld by contractors and others who have access to information systems containing protected health information. Background checks for all personnel who will obtain access to systems holding sensitive but unclassified (SBU) data are one method of protection employed by DoD. SBU data is an informal designation for all information that, by law or regulation, requires some form of protection but is outside of a formal system for classifying national security information.

Roles and Responsibilities

Each of the following entities is responsible for the tasks listed under its name.

Contractor Security Officer or Designee

- · Call the TMA Privacy Office to request a Submitting Office Number (SON) if your company does not have already have one
- · Inform the TMA Privacy Office of the submitting employee's information (name, Social Security number, IT (ADP) level applied for, employer name, date)
- · Review SF-85P for completeness and red flags before submission



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- Ensure that SF-85P and FD-285 fingerprint card are sent in hard copy to OPM
- · Complete status checks with OPM by calling their Federal Investigations Processing Center at (724) 794-5612 ext.168
- · Contact OPM and inform the TMA Privacy Office if more than one year has passed since the application was submitted to OPM with no decision
- · Notify OPM and the TMA Privacy Office if employee leaves/is terminated before the end of the investigation process
- · Remove employee's access to DoD system(s) if s/he does not comply with a request to supply additional information to OPM and notify the TMA Privacy Office of this action
- · Be responsible for all tracking of the application
- · Remove access to DoD systems for employees who do not respond to requests for additional information

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Contractor Employee

- · Complete the SF-85P
- · Submit the SF-85P to their facility security officer or designee for prescreening
- · Provide additional information to OPM when requested during the course of the investigation
- · Sign the confidentiality agreement if given interim or full access to systems

TMA Privacy Office

- · Provide policy and guidance for contractors to follow
- · Provide websites for all necessary forms
- · Provide guidance on completing required forms
- · Maintain personnel security files according to DoD regulations
- · Coordinate submittal of application forms
- · Provide contractors with Investigation Scheduled Notice when available
- · Contact contractor if additional information is requested from investigation and adjudicating offices
- · Track approvals and send original notices to contractor
- · Instruct contractor security officer or designee to remove access to DoD systems for employees who do not respond to requests for additional information



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